

**EXHIBIT “B”**

**Certified Copy Transcript**

**In The Matter Of:**

Kalie Mutter vs. Heritage Management Group, Inc. et al

Deposition of Shahram Rezaiamiri, MD

January 15, 2020



**AccuTran, Inc.**  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

KALIE MUTTER, )  
Plaintiff, )CIVIL ACTION, FILE  
)  
V. )NO. 1:19-cv-02623-LMN  
)  
HERITAGE MANAGEMENT )  
GROUP, INC., INDIAN )  
RIVER TRANSPORT CO., )  
and DAVID HILL, )  
Defendants. )

\* \* \*

Videotaped Deposition of SHAHRAM REZAIAMIRI, M.D.

January 15, 2020

2:00 p.m.

South Atlanta Neurosurgery  
900 Eagles Landing Parkway  
Stockbridge, Georgia 30281

Reported By: Diane A. Parnell, CCR, RPR, A-123

\* \* \*

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1 I almost never give anybody more than 50. For leg  
2 pain, she has a better chance. But for back pain  
3 the success rate -- there are different reports.

4 The reports go from 39 percent to  
5 80 percent. I don't believe the studies that say  
6 80 percent because I have seen plenty.

7 And also the time -- the time factor  
8 is -- when you do a fusion, yeah, the success rate  
9 may be 70, 80 percent but it's only for a year or  
10 two, and then the pain come back with a vengeance.  
11 So -- so normally I give people 50 percent chance  
12 for both laser and fusion.

13 Q Okay.

14 A Better for leg pain.

15 Q Now, I know it looks like the last time  
16 you saw Ms. Mutter would have been in April 2018.  
17 Is that correct?

18 A Correct.

19 Q If Ms. Mutter is continuing to have back  
20 pain, based on what you've talked about, your  
21 understanding of the literature, your training and  
22 experience in the field, would you expect more  
23 likely than not she's going to continue to have back  
24 pain for the remainder of her life at this point?

25 MR. SCOTT: Objection.



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1                   THE WITNESS: Can I answer that question?

2 BY MR. CAMPBELL:

3                   Q      Yes.

4                   A      Yeah. So your question is do I expect her  
5 to have pain down the line?

6                   Q      Yeah. I know you haven't seen her since  
7 April 2018.

8                   A      That's right.

9                   Q      But if Ms. Mutter has testified that she's  
10 continued to have low-back pain to this day --

11                  A      Yeah.

12                  Q      -- just based on your training and  
13 experience in the field, other patients, would you  
14 expect that more likely than not, that back pain is  
15 going to continue for her day in and day out for the  
16 remainder of her life?

17                  MR. SCOTT: Objection.

18                  THE WITNESS: Well, hopefully -- hopefully  
19 we'll get better over time. And hopefully it  
20 will be more intermittent than severe, constant  
21 back pain all the time.

22                  I do expect her to have problems. Not so  
23 much from the surgery, from just the disc  
24 herniations. Because some people think because  
25 of the surgery she's going to have pain. It's



1                   from her condition. I expect her to have off  
2                   and on pain, you know, for many years.

3 BY MR. CAMPBELL:

4 Q        Okay. And why is that?

5                   MR. SCOTT: Object to form, the  
6                   responsiveness of the answer.

7                   You can continue.

8                   THE WITNESS: Okay. It's just in  
9                   prognosis for this kind of -- you know, I have  
10                  seen people get better. But statistically they  
11                  usually continue with pain.

12 BY MR. CAMPBELL:

13 Q        Let me ask you a more pointed question.

14 Looking at the -- the imaging that Ms. Mutter had as  
15 it relates to her low back, and based on her  
16 symptoms, based on your training and experience, do  
17 you expect more likely than not she will continue to  
18 have back pain in the future?

19                   MR. SCOTT: Objection.

20                   THE WITNESS: Correct.

21 BY MR. CAMPBELL:

22 Q        Okay. Based on your education, training  
23 and experience and all the information you've  
24 reviewed as it relates to this case, what do you  
25 believe brought on the low-back pain that you



1 treated Ms. Mutter for?

2 A The accident.

3 MR. SCOTT: Objection.

4 MR. CAMPBELL: Now, I've got your bills  
5 here. Let me just mark as an Exhibit 2 --

6 (Plaintiff's Exhibit No. 2

7 marked for identification.)

8 BY MR. CAMPBELL:

9 Q Just a compilation of bills from this  
10 case.

11 A Okay.

12 Q Give that to you, Doctor, real quick.

13 A (Witness viewing exhibit.)

14 Q And, Doctor, my first question for you is  
15 do those appear to be the bills for the care and  
16 treatment that you provided to Ms. Mutter?

17 A Yes.

18 Q It looks like there is both facility --  
19 are there both facility charges and provider  
20 charges?

21 A Probably.

22 Q Why would that be?

23 A Well, there is two parts: The Surgery  
24 Center, the surgery facility; and then the  
25 professional fee.



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